

## REMARKS

In the Office Action mailed March 24, 2005, the Examiner noted that claims 1-27 were pending, and rejected claims 1-27. Claims 1, 9, 17 and 25 have been amended, and, thus, in view of the forgoing claims 1-27 remain pending for reconsideration which is requested. No new matter has been added. The Examiner's rejections are traversed below.

Claims 1-5, 9-13, 17-21 and 25-27 were rejected under 35 U.S.C. § 102(b) as being anticipated by Isaacs, U.S. Patent Number 5,894,308, hereafter referred to as "Isaacs". This rejection is traversed and reconsideration is requested.

Isaacs discloses "[w]hen a 3D model is initially converted, co-located points are merged to share unique point representations. For example, the following pseudo-notation in Table I describes a representation for two triangles. The array 'points' is a list of all points used in the shape under consideration. The array 'polygons' is a list of the polygons of the shape, in this case two triangles. points[0]=0,0,0 points[1]=0,1,0 points[2]=1,1,0 points[3]=0,1,0 points[4]=0,0,0 points[5]=1,1,0 polygon[0]32 points[0], points[1], points[2] polygon[1]32 points[3], points[4], points[5]" (Isaacs, column 5, lines 17-33). In other words, Isaac discloses converting a 3D image into a plurality of triangles, each of which are defined by 3 points. Isaacs further discloses "these four techniques may be used in conjunction with either or both of two additional features--(a) locking user-selected points in the 3D graphic object and (b) conserving surface boundary edges in the 3D graphic object.

Each of these techniques and features is discussed in detail" (Isaacs, column 7, lines 23-27). In other words, Isaacs discloses that the points which represent the boundary of the triangle, which were defined by the initial 3D model conversion, can be locked by the user, thus preventing the program from removing the points. Therefore, because Isaac only discloses user locking of points which define the boundary of a triangle, Isaac fails to teach or suggest "a selecting unit selecting a point on a displayed detailed shape; a generating unit generating a plane configured by selected points; a model generating unit generating a simplified model corresponding to the detailed shape composed of data which indicates the generated plane" as recited, for example, in claim 1. See, for example, Fig. 1, which demonstrates an exemplary embodiment wherein "3 points are selected on the surface of the detailed shape" (Present specification, page 8, lines 6-7, also see Fig. 1).

Furthermore, Isaacs fails to teach or suggest the feature of "a display unit displaying the simplified model so that when an angle of normals of adjacent planes generated by the

generating unit is smaller than a predetermined value a line between the adjacent planes is not displayed" as recited, for example, in amended claim 1.

Therefore, the applicant respectfully requests reconsideration of the rejection of claims 1-5, 9-13, 17-21 and 25-27 under 35 U.S.C. § 102(b) because Isaacs at least fails to teach or suggest the above-identified features of independent claims 1, 9 and 17.

Claims 2-5, 10-13, 18-21 and 25-27 depend from one of claims 1, 9 and 17 and include all the features of that claim. Therefore, it is submitted that claims 2-5, 10-13, 18-21 and 25-27 patentably distinguish over the prior art.

In the Office Action, at page 5, claims 6, 7, 14, 15, 22 and 23 were rejected as being unpatentable under 35 U.S.C. §103 in view of Isaacs, U.S. Patent Number 5,894,308 (hereafter Isaacs) and Brittain et al., U.S. Patent Number 6,072,498 (hereafter Brittain). The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.

Claims 6, 7, 14, 15, 22 and 23 depend from one of claims 1, 9 and 17 and include all the features of that claim. Therefore, it is submitted that these claims patentably distinguish over the prior art.

Therefore, the applicant respectfully requests reconsideration of the rejection of claims 6, 7, 14, 15, 22 and 23 under 35 U.S.C. § 103(a) because Isaacs at least fails to teach or suggest the above-identified features of independent claims 1, 9 and 17.

In the Office Action, at page 7, claims 8, 16 and 24 were rejected as being unpatentable under 35 U.S.C. §103 in view of Isaacs, U.S. Patent Number 5,894,308 (hereafter Isaacs), Brittain et al., U.S. Patent Number 6,072,498 (hereafter Brittain) and Schuur et al., U.S. Patent Number 5,504,853 (hereafter Schuur). The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.

Claims 8, 16 and 24 depend from one of claims 1, 9 and 17 and include all the features of that claim. Therefore, it is submitted that claims 8, 16 and 24 patentably distinguish over the prior art.

Therefore, the applicant respectfully requests reconsideration of the rejection of claims 8, 16 and 24 under 35 U.S.C. § 103(a) because Isaacs at least fails to teach or suggest the above-identified features of independent claims 1, 9 and 17.

In the Office Action, at page 1, claim 25 was objected to. The reasons for the rejection are set forth in the Office Action and therefore not repeated. Claim 25 has been amended herein. Applicants respectfully request withdrawal of the claim objection.

It is submitted that the claims satisfy the requirements of 35 U.S.C. §§ 102 and 103. It is further submitted that the claims are not taught, disclosed or suggested by the prior art. The claims are therefore in a condition suitable for allowance. An early Notice of Allowance is requested.

If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,

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